

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WISCONSIN

In re: Michael S & Heather N Thompson

Case No. 25-10380-13

Debtor(s)

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN and AMENDED SCHEDULES

Mark Harring, Standing 13 Trustee, by his attorney, objects to confirmation of the First Amended Chapter 13 Plan and Request to Amend Unconfirmed Plan filed as Document #36 on 5/19/2025 together with Amended Schedules I&J filed as Document #37 and states as follows:

1. Plan is amended to increase plan payments from \$2320/mo to \$2650/mo for the final 58 months of a 60 month plan. The amended budget supports the debtors' ability to make the higher payments and provides new employment information. However, the debtors are also relying on net business income so either a forward-looking business budget or current P&L is required to support that portion of the income.
2. Plan is amended to adjust treatment of the secured obligation due Westby Coop Credit Union with a claim balance of \$122,982.64, interest rate of 8.5% and equal monthly payments of \$2612/mo starting in Month 3 of this plan.
3. Plan is amended to adjust treatment of the secured obligation due Kia Finance with a claim balance of \$18,819.72, interest rate of 7.5% and adequate protection/equal monthly payments of \$263/mo.
4. Plan is amended to provide for payment of \$1,867.21 mortgage arrears as shown on the claim filed by Wells Fargo, NA. The debtors are to make current mortgage payments directly.
5. Schedule C is amended to use only Wisconsin state exemptions and includes protection of MT Bottle business assets using the available business exemption. This office has no objection to this exemption claim IF the debtors support their ongoing business involvement with either a business budget or P&L as noted above.
6. As these documents were timely filed (although we note an outdated plan form has been used) the 4/28/2025 Court Order is resolved.

Dated: May 28, 2025

Standing Chapter 13 Trustee
By: /s/ *Leslie Brodhead Griffith*
Leslie Brodhead Griffith
Attorney for Trustee
122 W Washington Ave, Suite 500
Madison, WI 53703-2758
(608) 256-4320